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February 15, 2018

VIA ELECTRONIC & US MAIL

Ms. Jennifer LaPoma
ATTN: Lower Passaic River Remedial Project Manager
Emergency and Remedial Response Division
U.S. EPA, Region 2
290 Broadway, 19th Floor
New York, New York 10007

**Re: Monthly Progress Report No. 129 – January 2018
Lower Passaic River Study Area (LPRSA) Remedial Investigation/Feasibility Study
(RI/FS)
CERCLA Docket No. 02-2007-2009**

Dear Ms. LaPoma:

de maximis, inc. is submitting this Monthly Progress Report for the above-captioned project on the behalf of the RI/FS Agreement Settling Parties (Cooperative Parties Group or CPG) pursuant to the Administrative Settlement Agreement and Order on Consent (Settlement Agreement or AOC). The Progress Report satisfies the reporting requirements of Paragraph 42 of said Settlement Agreement. The CPG has revised this Progress Report to address the Region's direction in its September 1, 2015 letter about Section (d).

(a) Actions which have been taken to comply with this Settlement Agreement during the previous month.

Meetings/Conference Calls

- On January 4, EPA Region 2 (Region 2), CPG and Region 2 and CPG consultants held a teleconference to discuss the Upper 9-mile Feasibility Study (FS).
- On January 11, Region 2 and CPG consultants held a teleconference call to discuss Contaminant Fate and Transport (CFT) model calibration status and issues.

Correspondence

- On January 3, CPG notified Region 2 that the revised Draft 17-mile Baseline Ecological Risk Assessment (BERA) and additional sections of the revised Draft 17-mile Remedial Investigation (RI) Report were uploaded to Region 2's SharePoint site on December 28 and 29, respectively.

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- On January 2, CPG and Region 2 exchanged emails regarding the potential start time and attendee list for the January 4 meeting to discuss the Upper 9-mile FS.
- On January 2, Region 2 notified CPG of the designation of a new LPRSA Project Coordinator.
- On January 3, CPG uploaded revised figures from the revised Draft 17-mile RI Report to Region 2's SharePoint site.
- On January 3, CPG provided Region 2 slides for the January 4 meeting to discuss the Upper 9-mile FS.
- On January 3, Region 2 notified CPG that the scheduled January 4 meeting to discuss the Upper 9-mile FS was changed to a webinar due to potential weather that could affect travel conditions.
- On January 4, CPG provided Region 2 a revised version of the slides for that day's webinar to discuss the Upper 9-mile FS.
- On January 4, Region 2 noted that CPG had uploaded response to comments (RTCs) on Sections 1 through 3 of the revised Draft 17-mile RI Report along with the revised sections on December 29, 2017 and asked if there were going to be any additional RTCs submitted.
- On January 5, CPG provided RTCs for Sections 5, 8 and 9 of the revised Draft 17-mile RI Report to Region 2.
- On January 5, CPG transmitted CFT model file supplements to the December 27, 2017 transmittal to Region 2.
- On January 10, Region 2 issued an invitation to CPG to present at the Contaminated Sediments Technical Advisory Group (CSTAG) meeting for the LPRSA on March 1, 2018.
- On January 10, CPG and Region 2 exchanged emails regarding a mark-up of the Table of Contents (TOC) indicating the status of appendices for the revised Draft 17-mile RI Report.
- On January 11, CPG and Region 2 exchanged emails regarding the exposure zones for the Upper 9-mile Exposure Assessment in the Bioaccumulation Model.
- On January 11, CPG provided a marked up TOC and submission dates for the revised Draft RI Report appendices to Region 2.
- On January 11, CPG provided slides discussed during the January 11 conference call regarding CFT model calibration to Region 2.
- On January 16, CPG accepted Region 2's invitation to participate and provide a presentation at the CSTAG meeting on March 1, 2018 and provided details for a tour of the upper 9 miles of the LPRSA.
- On January 16, CPG delivered the December Monthly Progress Report to Region 2.
- On January 17, Region 2 consultants requested an update regarding the status of delivery of the remaining item from the CFT model conference call on January 11.
- On January 18, CPG provided an alternative model-to-data comparison to Region 2.
- On January 25, CPG provided action items from the December 7, 2017 meeting regarding the Bioaccumulation Model to Region 2.
- On January 24, CPG provided Region 2 a summary of issues potentially causing problems for Region 2's consultant to reproduce CPG model simulations.
- On January 25, CPG provided an additional model-to-data comparison to Region 2.

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- On January 26, CPG provided a mass balance summary to Region 2 consultants.
- On January 29, CPG provided proposed Remedial Action Objectives (RAOs) and Remedial Alternatives to Region 2 in advance of the scheduled February 5, 2018 teleconference on the Upper 9-mile FS
- On January 31, CPG uploaded Sections 7 and 10 and Appendices G, I, J, L, M and N of the revised Draft 17-mile RI Report to Region 2's SharePoint site.

Work

- CPG continued work to address Region 2's comments on the revised Draft 17-mile RI Report and Model Appendices.
- CPG continued work on calibration of the revised LPR/Newark Bay CFT model.
- CPG continued work on revision of the LPR Bioaccumulation Model.
- CPG continued work on revision of Newark Bay Model documentation.
- CPG continued work on preliminary identification and evaluation of Upper 9-mile remedial alternatives.
- CPG responded to Region 2 comments and questions on the Upper 9-mile Plan.

(b) Results of Sampling and Tests

- None.

(c) Work planned for the next two months with schedules relating to the overall project schedule for RI/FS completion

- CPG will continue work on the revised Draft 17-mile RI Report and Model Appendices in response to Region 2 comments with an anticipated delivery of remaining revised sections in February 2018.
- CPG will continue calibration of the revised LPR/Newark Bay CFT model and continue to work with HDR to complete the calibration.
- CPG will continue revising the LPR Bioaccumulation Model pursuant to Region 2 comments.
- CPG will continue work on Newark Bay Model documentation.
- CPG will continue preliminary identifications of remedial alternatives for the upper 9-miles.

(d) Problems encountered and anticipated problems, actual or anticipated delays, and solutions developed and implemented to address actual or anticipated problems or delays.

- **Remedial Investigation (RI) Report** – The CPG delivered a revised draft of RI Report Section 4 - Reach-by-Reach Analysis for the Upper 9-mile Plan to Region 2 on August 31. CPG provided revised Draft RI Report Sections 1 – 3 to Region 2 on November

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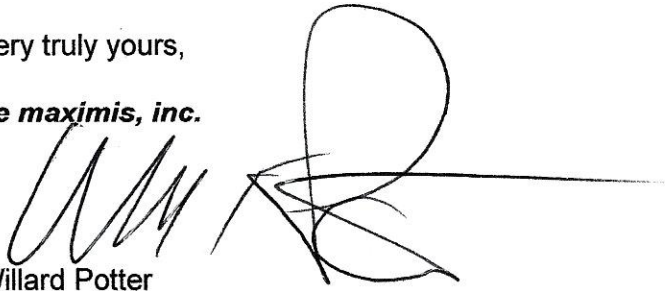
30. CPG provided non-modeling Sections 5, 8 and 9 of revised Draft RI Report to Region 2 on December 29 and Sections 7 and 10 and Appendices G, I, J, L, M, and N on January 31, 2018. The CPG will continue revisions to the Draft 17-mile RI Report and provide remaining revised sections in February 2018.

- **Feasibility Study (FS)** – Region 2 and the CPG are currently discussing refocus of the FS to the upper 9 miles and accelerating its completion and met via teleconference on January 4, 2018.
- **Baseline Ecological Risk Assessment (BERA)** - The CPG delivered revision 2 of the Draft 17-mile BERA to Region 2 on December 28, 2017.
- **Other Documents** - There are number of reports and technical memos (both original and revised submissions) that have been submitted to Region since 2011 that the CPG is awaiting either approval or Region 2's comments. These reports include:
 1. Upstream Reference Benthic Data Report – submitted August 2013
 2. Background Sediment Data Report – submitted October 2013

If you have any questions, please contact Rob Law or me at (908) 735-9315.

Very truly yours,

de maximis, inc.


Willard Potter
CPG Project Coordinator

cc: Frances Zizila, EPA Region 2 Office of Regional Counsel
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